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August 8, 2019

Federal Communications Commission
Washington, D. C. 20554

To Whom It May Concern:

I respectfully submit my comments in response to the NPRM WC Docket No. 13-184 released on July 9, 2019. I represent an urban charter school system in Arkansas with an enrollment of approximately 3,000 students and a Category 2 budget discount rate of only 60%.

In the state of Arkansas, a charter school is classified as a non-traditional public school. This classification prohibits a charter school, or charter school system, from calling for a bond or millage election to support technology initiatives, new school construction, etc. Most of our revenue comes from state funding per student with minimal additional revenue from other sources. As a result of this funding formula, there are minimal funds remaining for capital outlay which is used for technology initiatives.

I urge you to continue funding Category 2 projects as well as a full reset of the Category 2 budget every 5 years. Additionally, an increase in the per pupil funding is greatly needed. It's also important to provide funds district-wide instead of based on each campus enrollment. A district-wide formula will allow us to apply our funds to our schools with the greatest need. We strive for equity at each of campuses. Our goal of having laptops for every student is in process but having adequate infrastructure to meet that goal is critical.

Our smallest campus enrollment is approximately 300 students while the high school has an enrollment of just over 900 students. Obviously, the needs for technology are greater at the high school. In order to have adequate infrastructure we have to other funds to pay for upgrades. Continuing the current scenario, we would have to use more of the operating budget for additional infrastructure, thereby, reducing funds available for other student resources.

I hope you choose to continue to support the E-Rate C2 program supporting critical infrastructure for our students.

Sincerely,
Mark Milhollen
Chief Financial Officer
eStem Public Charter Schools